

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: MLCJR LLC, <i>et al.</i>, Debtors.¹	§ § § § § §	Case No. 23-90324 (CML) (Chapter 7) (Jointly Administered)
--	----------------------------	---

**WITNESS AND EXHIBIT LIST OF
NATURAL RESOURCES WORLDWIDE LLC FOR
THE HEARING ON THE EMERGENCY MOTION FOR AUTHORITY TO
(A) RELINQUISH CERTAIN FEDERAL LEASES; (B) ABANDON THE REMAINING
TITLE TO CERTAIN FEDERAL LEASES; AND (C) FOR RELATED RELIEF**

Natural Resources Worldwide LLC (“NRW”) hereby submits its Witness and Exhibit List in connection with the hearing scheduled for Tuesday, January 28, 2025 at 1:00 p.m. in Courtroom 401 (the “Hearing”), on the *Emergency Motion For Authority To (A) Relinquish Certain Federal Leases; (B) Abandon The Remaining Title To Certain Federal Leases; And (C) For Related Relief* [Dkt. 2341]:

WITNESS LIST

NRW may call the following witnesses at the Hearing:

1. Vincent DeVito, Manager and CEO, NRW;
2. Steven Dudgeon, Severance Tax/Royalty, Ryan, LLC;
3. Any witnesses listed or called by any other party; and
4. Any witnesses necessary for rebuttal, impeachment, or authentication purposes.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identifications number, are: MLCJR, LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL oil & Gas, LLC (9562); and M21K, LLC (3978).

EXHIBIT LIST

NRW may use the following exhibits at the Hearing:

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>MARK</u>	<u>OFFER</u>	<u>OBJECT</u>	<u>ADMIT</u>	<u>W/D</u>	<u>DISPOSITION AFTER HEARING</u>
1	<p>[In Globo] Assignment of Record Title Interest Forms (BOEM-0150), Assignment of Operating Rights Interest Forms (BOEM-0151), and/or Designation of Operator Forms (BOEM-1123) submitted to the Bureau of Ocean Energy Management for Federal Leases</p> <p>[1] OCS-00016, [2] OCS-00026, [3] OCS-00126, [4] OCS-00127, [5] OCS-00128, [6] OCS-00129, [7] OCS-00130, [8] OCS-00131, [9] OCS-00132, [10] OCS-00133, [11] OCS-00134, [12] OCS-00174, [13] OCS-00175, [14] OCS-00176, [15] OCS-00177, [16] OCS-00179, [17] OCS-00180, [18] OCS-00181, [19] OCS-00182, [20] OCS-00310, [21] OCS-00367, [22] OCS-00819, [23] OCS-00821, [24] OCS-00827, [25] OCS-00838, [26] OCS-00839, [27] OCS-G-01019, [28] OCS-G-01228, [29] OCS-G-01230, [30] OCS-G-01447, [31] OCS-G-01497, [32] OCS-G-01498, [33] OCS-G-01673, [34] OCS-G-02213, [35] OCS-G-02323, [36] OCS-G-04109, [37] OCS-G-04231, [38] OCS-G-04437, OCS-G-08684, [40] OCS-G-12951, [41] OCS-G-24954, [42] OCS-G 02324</p>						

2	<p>[In Globo] Acknowledgment of Receipt E-mails from The Adjudication Team for the Assignment of Record Title Interest Forms (BOEM-0150), Assignment of Operating Rights Interest Forms (BOEM-0151), and/or Designation of Operator Forms (BOEM-1123) submitted to the Bureau of Ocean Energy Management for Federal Leases</p> <p>[1] OCS-00016, [2] OCS-00026, [3] OCS-00126, [4] OCS-00127, [5] OCS-00128, [6] OCS-00129, [7] OCS-00130, [8] OCS-00131, [9] OCS-00132, [10] OCS-00133, [11] OCS-00134, [12] OCS-00174, [13] OCS-00175, [14] OCS-00176, [15] OCS-00177, [16] OCS-00179, [17] OCS-00180, [18] OCS-00181, [19] OCS-00182, [20] OCS-00310, [21] OCS-00367, [22] OCS-00819, [23] OCS-00821, [24] OCS-00827, [25] OCS-00838, [26] OCS-00839, [27] OCS-G-01019, [28] OCS-G-01228, [29] OCS-G-01230, [30] OCS-G-01447, [31] OCS-G-01497, [32] OCS-G-01498, [33] OCS-G-01673, [34] OCS-G-02213, [35] OCS-G-02323, [36] OCS-G-04109, [37] OCS-G-04231, [38] OCS-G-04437, OCS-G-08684, [40] OCS-G-12951, [41] OCS-G-24954, [42] OCS-G 02324</p>						
3	<p>[In Globo] OCS Mineral Lesse's or Operator's Bond Form (BOEM-2028), OCS Mineral Lesse's or Operator's Supplemental Bond Forms (BOEM-2028A), and OCS Pipeline Right-of-Way Grant Bond Form (BOEM-2030) with Bond Numbers:</p> <p>[1] N-8100059 [2] N-8100060 [3] N-8100063 [4] N-8100079</p>						

4	<i>Natural Resources Worldwide LLC v. U.S. Department of the Interior et al</i> , Docket No. 2:25-cv-00111, E.D. La., Complaint, Cover Sheet, Exhibits, and Summonses [R. Doc. 1]						
5	[In Globo] Closing Documents - Acquisition of Array Petroleum, LLC						
6	E-mail from Edward B. Poitevent, II to Ryan Lamb regarding NRW Installment Agreement dated June 14, 2024						
7	E-mail between Steve Dudgeon and Ryan Lamb regarding NRW Update and NRW Settlement Amount Explanation 10.2.2024 dated October 2, 2024						
8	E-mail between Ryan Lamb and Steven Dudgeon regarding NRW Update and (DOJ) NRW Outstanding Liabilities 10-09-2024 dated October 10, 2024						
9	E-mail between Steve Dudgeon and Ryan Lamb regarding NRW Update and NRW Reversals and Rebooks 10.10.24 dated October 10, 2024						
10	E-mail between Ryan Lamb and Steven Dudgeon regarding NRW Update and Cox Bankruptcy Lease Amount Owed dated October 29, 2024						
11	E-mail between Steve Dudgeon and Ryan Lamb regarding NRW Update dated October 29, 2024						
12	Offshore Contract Operating Agreement between Natural Resources Worldwide LLC and Array Petroleum, LLC effective February 1, 2024						
13	Array Petroleum – AFE TRACKER December 2024						
14	Correspondence - Audit of the Books and Records of Array Petroleum dated November 12, 2024						

15	E-mails between Ken Jackson and Jeff Chiasson regarding Monthly OI Totals from November of 2024						
16	E-mail between Ken Jackson and Rec Chaddock regarding October Model dated October 18, 2024						
17	E-mail between Ken Jackson and Rec Chaddock regarding Open Invoice LOE + AFE dated November 5, 2024						
18	E-mail between Ken Jackson and Rec Chaddock regarding Hurricane Francine AFE from October 25, 2024						
19	[In Globo] Pay.Gov ONRR Royalty and Invoice Payments from May of 2024 through December of 2024						
20	NRW reserves the right to offer any exhibit listed by any other party						

Dated: January 27, 2025

STONE PIGMAN WALTHER WITTMANN L.L.C.

/s/ Andrew D. Mendez

Andrew D. Mendez (Texas Bar No. 00797066)
 Bryant S. York (Texas Bar No. 24084866)
 Paul J. Masinter, *Pro Hac Vice* (La. Bar No. 18324)
 909 Poydras Street, Suite 3150
 New Orleans, Louisiana 70112
 Telephone: (504) 581-3200
 Facsimile: (504) 581-3361
 Email: amendez@stonepigman.com
byork@stonepigman.com
pmasinter@stonepigman.com

Attorneys for Natural Resources Worldwide LLC

CERTIFICATE OF SERVICE

I certify that on January 27, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Andrew D. Mendez